

1 LATHAM & WATKINS LLP
Christopher Harris (Bar No. 187472)
2 christopher.harris@lw.com
Andrew M. Parlen (Bar No. 230429)
3 andrew.parlen@lw.com
885 Third Avenue
4 New York, New York 10022
Telephone: +1.212.906.1200
5 Facsimile: +1.212.751.4864

6 LATHAM & WATKINS LLP
Amy C. Quartarolo (Bar No. 222144)
7 amy.quartarolo@lw.com
355 South Grand Avenue, Suite 100
8 Los Angeles, California 90071-1560
Telephone: +1.213.485.1234
9 Facsimile: +1.213.891.8763

10 *Attorneys for Crockett Cogeneration, Middle River*
11 *Power, LLC, and MRP San Joaquin Energy, LLC*

12 UNITED STATES BANKRUPTCY COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15
16 PG&E CORPORATION and PACIFIC
GAS & ELECTRIC COMPANY,

17 Debtors.

Case No. 19-30088 (Main)
Case No. 19-30089 (Jointly Administered)

Chapter Number: 11

18 **NOTICE OF APPEARANCE AND**
19 **REQUEST FOR SERVICE OF**
20 **DOCUMENTS**

21
22
23
24
25 PLEASE TAKE NOTICE that, pursuant to rules 2002, 9007 and 9010(b) of the Federal
26 Rules of Bankruptcy Procedure, and sections 1102(1) and 1109(b) of title 11 of the United States
27 Code, the undersigned attorneys appear as counsel in the above-captioned bankruptcy cases
28 ("Chapter 11 Cases") on behalf of parties-in-interest Crockett Cogeneration, Middle River

FILED
FEB 12 2019
UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

ORIGINAL

FAXED

1 Power, LLC, and MRP San Joaquin Energy, LLC, and request that all notices given or required
2 to be given in connection with the Chapter 11 Cases, and all papers served or required to be
3 served in connection therewith, be given and served upon:

4 Christopher Harris
5 Andrew M. Parlen
6 LATHAM & WATKINS LLP
7 885 Third Avenue
8 New York, New York 10022
9 Telephone: +1.212.906.1200
10 Facsimile: +1.212.751.4864
11 Email: christopher.harris@lw.com
12 Email: andrew.parlen@lw.com

13 Amy C. Quartarolo
14 LATHAM & WATKINS LLP
15 355 South Grand Avenue, Suite 100
16 Los Angeles, California 90071-1560
17 Telephone: +1.213.485.1234
18 Facsimile: +1.213.891.8763
19 Email: amy.quartarolo@lw.com

20 PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without
21 limitation, any and all notices in respect of any application, motion, petition, pleading, request,
22 complaint, demand, order, or any other paper filed in the Chapter 11 Cases, whether such notice
23 is formal or informal, written or oral, and whether transmitted by hand delivery, United States
24 Mail, electronic mail, expedited delivery service, telephone, telecopy or otherwise.

25 PLEASE TAKE FURTHER NOTICE that the undersigned requests that the Debtors and
26 the Clerk of the Court place the foregoing names and addresses on any mailing matrix or list of
27 creditors existing or to be prepared in these Chapter 11 Cases.

28 This Notice of Appearance and Request for Service of Documents shall not be deemed or
construed to be a waiver of (i) Crockett Cogeneration, Middle River Power, LLC, and MRP San
Joaquin Energy, LLC's right to have final orders in non-core matters entered only after de novo
review by a United States District Court; (ii) Crockett Cogeneration, Middle River Power, LLC,
and MRP San Joaquin Energy, LLC's right to trial by jury in any proceedings so triable in this
case or in any case, controversy, or proceeding related hereto; (iii) Crockett Cogeneration,

1 Middle River Power, LLC, and MRP San Joaquin Energy, LLC's right to have a United States
2 District Court withdraw the reference in any proceeding subject to mandatory or discretionary
3 withdrawal; or (iv) Crockett Cogeneration, Middle River Power, LLC, and MRP San Joaquin
4 Energy, LLC's rights, claims, actions, defenses, setoffs, or recoupments to which each Crockett
5 Cogeneration, Middle River Power, LLC, and MRP San Joaquin Energy, LLC is or may be
6 entitled under agreements, in law or in equity, all of which rights, claims, defenses, setoffs and
7 recoupments each of Crockett Cogeneration, Middle River Power, LLC, and MRP San Joaquin
8 Energy, LLC expressly reserves.

9 DATED: February 12, 2019

10 Respectfully Submitted,

11
12 Christopher Harris (SBN 187472)
13 Andrew M. Parlen (SBN 230429)
14 LATHAM & WATKINS LLP
15 885 Third Avenue
16 New York, New York 10022-4834
17 Telephone: (212) 906-1200
18 chistopher.harris@lw.com
19 andrew.parlen@lw.com

20 -and-

21 Amy C. Quartarolo (SBN 222144)
22 LATHAM & WATKINS LLP
23 355 S. Grand Avenue, Suite 100
24 Los Angeles, California 90071-1560
25 Telephone: (213) 485-1234
26 amy.quartarolo@lw.com

27 By: 
28 Amy C. Quartarolo

*Attorneys for Crockett Cogeneration, Middle
River Power, LLC, and MRP San Joaquin
Energy, LLC*

PROOF OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to this action. My business address is Latham & Watkins LLP, 355 South Grand Avenue, Suite 100, Los Angeles, CA 90071-1560.

On **February 12, 2019**, I served the following document described as:

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

by serving a true copy of the above-described document in the following manner:

BY U.S. MAIL

I am familiar with the office practice of Latham & Watkins LLP for collecting and processing documents for mailing with the United States Postal Service. Under that practice, documents are deposited with the Latham & Watkins LLP personnel responsible for depositing documents with the United States Postal Service; such documents are delivered to the United States Postal Service on that same day in the ordinary course of business, with postage thereon fully prepaid. I deposited in Latham & Watkins LLP's interoffice mail a sealed envelope or package containing the above-described document and addressed as set forth below in accordance with the office practice of Latham & Watkins LLP for collecting and processing documents for mailing with the United States Postal Service:

WEIL, GOTSHAL, & MANGES LLP
Matthew Goren
Stephen Karotkin
Jessica Liou
767 Fifth Avenue
New York, NY 10153

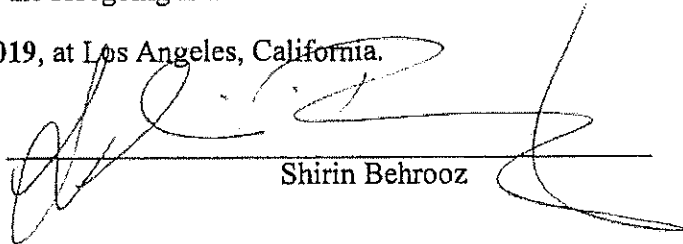
CRAVATH, SWAINE & MOORE LLP
David A. Herman
Omid H. Nasab
Kevin J. Orsini
Paul H. Zumbro
85 Eighth Avenue
New York, NY 10019

KELLER & BENVENUTTI LLP
Tobias S. Keller
Jane Kim
650 California St, Suite 1900
San Francisco, CA 94108

OFFICE OF THE UNITED STATES
TRUSTEE
Lynette C. Kelly
Marta Villacourta
450 Golden Gate Avenue
5th Floor, #05-0153
San Francisco, CA 94102

I declare that I am employed in the office of a member of the Bar of, or permitted to practice before, this Court at whose direction the service was made and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **February 12, 2019**, at Los Angeles, California.


Shirin Behrooz